

Comments of Powerex Corp. on Western's Revised OATT

Powerex is the wholly-owned marketing subsidiary of the British Columbia Hydro and Power Authority ("BC Hydro"), a provincial Crown Corporation owned by the Government of British Columbia. Powerex sells power at wholesale in the United States. Powerex sells power from a portfolio of resources, including the Canadian Entitlement resources made available under the Columbia River Treaty, BC Hydro system surplus resources, and various other power resources acquired from other sellers within the United States. Powerex also markets power in Canadian provinces other than British Columbia and in Mexico.

Powerex is a transmission customer of Western.

Powerex Corp. provides the following comments in response to the proposed revision to Western's Open Access Transmission Tariff (OATT)

1. Western is proposing to increase the long-term (>1 year) Firm Point to Point service processing fee to \$3,500 across all Western's regions. This more than doubles the current fee. Please explain in detail why the fee has increased by such a substantial amount and why Western has adopted a one-rate fee structure.
2. Western is proposing to not pay interest on deposits for long-term (>1 year) Firm Point to Point service but instead transmission customers may opt to establish an interest-bearing escrow account. Please explain in detail how this option would work.
3. Western is proposing to remove the termination provision for transmission customers to terminate service under a new rate (Section 1.0 Change of Rates, Attachment J of Western's OATT). Please explain in detail why Western has removed this language. Powerex is concerned that the removal of this language will eliminate a transmission customer's ability to terminate service or choose not to seek renewal of its rollover rights when a new rate would make it uneconomical to do so.
4. Powerex would also like Western to confirm that it will provide customers reasonable notice of new rates so that customers have current information to base its decisions on whether to exercise rollover rights on Western transmission.